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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **DOUGLAS MATTERN, et al.,**
13 **Plaintiffs,**
14 **v.**
15 **PUSHTRAFFIC, et al.,**
16 **Defendants.**

NO. 10-CV-2924 TEH

**STIPULATION FOR CONSENT TO TRO
AND EXTENSION OF TIME TO RESPOND
TO FIRST AMENDED COMPLAINT and
(PROPOSED) ORDER**

No Hearing Required

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19 **STIPULATION**

20 1. Defendant Progressive Tax Group and Plaintiffs, hereby stipulate that in regards to
21 the Plaintiffs' Motion for Temporary Restraining Order (Doc. 33), Progressive Tax Group
22 and Plaintiffs hereby consent to the following which shall be deemed a full and complete
23 resolution of the issues in the TRO:

24 "Progressive Tax Group, including its employees and agents, without admitting
25 fault or waiving any personal jurisdiction, venue or other FRCP Rule 12
26 defenses, agrees not to knowingly contact the named plaintiffs in this action to
27 solicit business as long as Progressive Tax Group remains a party in the
28 matter."

2. Defendant Progressive Tax Group and Plaintiffs, hereby stipulate to extend the date for filing a response to the First Amended Complaint. Defendant Progressive Tax Group shall file a response no later than January 3, 2011.

Dated: November 10, 2010.

PROGRESSIVE TAX GROUP

s/ James Phan, Esq.
James Phan
Corporate Counsel for
PROGRESSIVE TAX GROUP

Dated: November 10, 2010.

LAW OFFICE OF THOMAS EASTON

By. s/ Thomas Easton, Esq.
Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE (CM-ECF)

I hereby certify that a true and correct copy of the forgoing document has been filed with the Courts' CM/ECF filing system on this November 10, 2010, which will provide service on all counsel of record.

s/Thomas Easton, Esq;

(~~PROPOSED~~) ORDER

The Court, having considered the Consent to TRO and Stipulation for Extension of Time to Respond to the First Amended Complaint submitted by the parties, and good cause appearing:

1. The Stipulation for Consent to TRO and Extension of Time is approved;
2. The time for Defendant Progressive Tax Group to respond to the First Amended Complaint shall be January 3, 2011.

IT IS SO ORDERED.

Dated: 11/15/10

